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*Attorneys for Defendant C. R. Bard, Inc.  
and Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability  
Litigation,

No. 2:15-MD-02641-DGC

**NOTICE OF FILING REDACTED  
PLAINTIFFS' SEPARATE  
STATEMENT OF FACTS IN  
SUPPORT OF DEFENDANTS'  
MOTION TO SEAL DOCUMENTS  
FILED BY PLAINTIFFS IN  
OPPOSITION TO DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT REGARDING  
PREEMPTION**

COME NOW Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. and file  
in redacted form Plaintiffs' Separate Statement of Facts in Support of Their Opposition to

1 Defendants' Motion for Summary Judgment Regarding Preemption, which was previously  
2 filed under seal (Dkt. 7370).

3 This 28th day of September, 2017.

4  
5 s/Elizabeth C. Helm

6 Richard B. North, Jr.

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8 Matthew B. Lerner

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20 **Attorneys for Defendant C. R. Bard, Inc.**  
21 **and Bard Peripheral Vascular, Inc.**  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 28, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send notification of such filing to all counsel of record.

s/Elizabeth C. Helm

Elizabeth C. Helm

Georgia Bar No. 289930

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